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January 15, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Boston Edison Company, Cambridge Electric Light Company and
Commonwealth Electric Company, D.T.E. 03-100

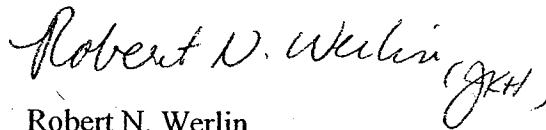
Dear Secretary Cottrell:

Enclosed for filing in the above-referenced matter are the responses of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric (the "Company") to the Information Request set forth on the accompanying list.

Because the attachments to the response are bulk documents, a single copy is being provided to the Cape Light Compact/Massachusetts Energy Consumers Alliance, Inc. ("CLC/MEC") and to the Department only.

Thank you for your attention to this matter.

Sincerely,

 (JRH)

Robert N. Werlin

Enclosures

cc: William Stevens, Hearing Officer
Service List (response only, except for CLC/MEC)

Responses to Information Requests

Information Request CLC/MEC-1-3(Supp)

Information Request CLC/MEC-1-3 (Supp)

- A. Please provide all documents pertaining to or referring to the development of the NSTAR Green Proposal, including, without limitation, earlier (pre-filing) versions of such proposal and internal Company memoranda suggesting the development of such a product.
- B. Please identify all NSTAR personnel who had a material role in the evaluation and preparation of the NSTAR Green Proposal and explain their role(s).

Response

BULK RESPONSE

- A. Without withdrawing its objection to this question articulated in the Company's initial response to this information request on January 6, 2004, the Company has reviewed its files to locate documents that "pertain" or "refer to" the development of the NSTAR Green Program (the "Program"). The Company has compiled three categories of such documents as follows:
- non-confidential documents, including, but not limited to: (1) memoranda; (2) e-mails; (3) meeting minutes; (4) draft marketing materials; (4) draft survey questions; (5) survey response matrices; (6) draft program descriptions; (7) information regarding other utility-renewable programs; and (8) notes detailing feedback from Massachusetts renewable industry officials regarding the Program ("Non-Confidential Documents");
 - confidential documents, including: (1) draft contracts with potential Renewable Energy Certificate ("REC") suppliers, and related e-mails; and (2) draft contracts with the Massachusetts Technology Collaborative ("MTC"), and related e-mails ("Confidential Documents"); and
 - documents reflecting communications between the Company and its counsel made in confidence for the purpose of seeking,

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obtaining, or providing legal assistance to the Company, including pre-filing versions of the Company's October 16, 2003 filing ("Privileged Communications"). As such the documents are protected by the attorney-client privilege. Also, to the extent that pre-filing versions of the Company's October 16, 2003 filing were prepared by counsel in preparation for this proceeding, they are protected by the work product doctrine. See Massachusetts Rules of Civil Procedure 26(b)(3).

The Company has attached the Non-Confidential Documents hereto (see Attachment CLC-MEC-1-3 **BULK**). The Company is not providing the Privileged Communications that are protected by the attorney-client privilege. Moreover, because the disclosure of the Confidential Documents would impair the Company's negotiating position with regard to its draft REC contracts and the draft contract with the MTC, the Company is not providing the Confidential Documents. The Company will file a Motion for Protective Treatment of both the Confidential Documents and the Privileged Communications that provides further support for the Company's position.